

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,)	
)	
Plaintiff/Counter-Defendant)	Civil Action No. 3:22-cv-00208-CWR-RPM
)	
v.)	
)	
HONOR SOCIETY.ORG, INC.,)	
)	
Defendant/Counter-Plaintiff)	
/Third-Party-Plaintiff)	
)	
HONOR SOCIETY FOUNDATION, INC.,)	
)	
Defendant)	
-----)	
HONOR SOCIETY.ORG, INC.,)	
)	
Defendant/Counter-Plaintiff)	
/Third-Party-Plaintiff)	
)	
v.)	
)	
DR. LYNN TINCHER-LADNER,)	
)	
Third-Party Defendant)	

**PHI THETA KAPPA HONOR SOCIETY’S AND LYNN
TINCHER-LADNER’S RESPONSE IN OPPOSITION TO HONOR
SOCIETY.ORG, INC. AND HONOR SOCIETY FOUNDATION, INC.’S
MOTION FOR RECONSIDERATION OF ORDER GRANTING
MOTION TO DISMISS**

Plaintiff Phi Theta Kappa Honor Society and Counter-Defendant Dr. Lynn Tinchler-Ladner hereby respond in opposition to Defendants HonorSociety.org, Inc. and Honor Society Foundation, Inc.’s (collectively, “Honor Society’s”) Motion for Reconsideration of Order Granting Motion to Dismiss [Dkt. #528] and request that the Court deny Honor Society’s Motion for the reasons explained in their accompanying memorandum brief in support.

WHEREFORE, Plaintiff Phi Theta Kappa Honor Society and Counter-Defendant Dr. Lynn Tincher-Ladner hereby request that the Court enter an order denying Honor Society's for Reconsideration of Order Granting Motion to Dismiss [Dkt. #528]

Dated: April 29, 2025.

Respectfully submitted,

Jonathan G. Polak (*Pro Hac Vice*)
W. Michael Etienne (*Pro Hac Vice*)
TAFT STETTINIUS & HOLLISTER LLP
One Indiana Square, Suite 3500
Indianapolis, IN 46204-2023
(317) 713-3500 – phone
(317) 713-3699 – fax
jpolak@taftlaw.com
metienne@taftlaw@taftlaw.com

Rachel Smoot (*Pro Hac Vice*)
TAFT STETTINIUS & HOLLISTER LLP
41 S. High Street, Suite 1800
Columbus, OH 43215
(614) 221-2838 – phone
(614) 221-2007 – fax
rsmoot@taftlaw.com

Daniel R. Warncke (*Pro Hac Vice*)
TAFT STETTINIUS & HOLLISTER LLP
425 Walnut Street, Suite 1800
Cincinnati, OH 45202
(513) 357-9397 – phone
dwarncke@taftlaw.com

Philip R. Bautista (*Pro Hac Vice*)
TAFT STETTINIUS & HOLLISTER LLP
200 Public Square, Suite 3500
Cleveland, OH 44114-2302
(216) 706-3686 – phone
pbautista@taftlaw.com

/s/ Charles E. Cowan
Michael B. Wallace, MSB # 6904
Charles E. Cowan, MSB #104478
Jack F. Hall, MSB #106482

WISE CARTER CHILD & CARAWAY, P.A.
Post Office Box 651
Jackson, Mississippi 39205
Phone 601-968-5500
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Charles E. Cowan, do hereby certify that I have this day filed the foregoing with the Clerk of the Court via the ECF filing system, which sent notification of such filing to all counsel of record.

Dated: April 29, 2025.

/s/ Charles E. Cowan
Charles E. Cowan